December 26, 2001

Ms. Marilyn Hamilton
Standard Register Company
1251 North Fruitridge
Terre Haute, IN 47804

Re: 167-15077
Fifth Administrative Amendment to
FESOP 167-7790-00060

Dear Ms. Hamilton:

Standard Register Company was issued a permit on March 17, 1998 for flexographic printing operation. A letter requesting the following changes: a name change of the Responsible Official, press installation, press removal, and press renumbering was received on October 26, 2001. Pursuant to the provisions of 326 IAC 2-8-10(a)(2), (6), and (14), the permit is hereby administratively amended as follows:

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and Vigo County Air Pollution Control (VCAPC), and presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a flexographic printing operation.

Responsible Official:	~~George Stubbs~~ **Plant Manager**
Source Address:	1251 North Fruitridge, Terre Haute, Indiana 47808
Mailing Address:	Same as Source Address
SIC Code:	2761
County Location:	Vigo
County Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Major Source, under Emission Offset Rules;

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

~~1. One (1) web press (Model MPDC108) which is identified as P4. This press was installed in 1981.~~

~~2. One (1) web press (Model MPDC108) which is identified as P5. This press was installed in 1981.~~

~~3. One (1) web press (Model 90-1232) which is identified as P19. This press was installed in 1991.~~

1. One (1) web press (Model 88-1232) which is identified as P**1**21. This press was installed in 1994.

2. One (1) web press (Model 88-1242) which is identified as P**1**20. This press was installed in 1990.

3. One (1) web press (Model 89-1241) which is identified as P**1**18. This press was installed in 1990.

~~7. One (1) web press (Model 87-1225) which is identified as P16. This press was installed in 1989.~~

4. One (1) web press (Model 88-1234) which is identified as P**1**17. This press was installed in 1989.

~~9. One (1) web press (Model 85-1637) which is identified as P15. This press was installed in 1987.~~

5. One (1) web press (Model 90-1255) which is identified as ~~PB1~~ **P140**. This press was installed in 1993.

6. One (1) web press (Model 390-4598) which is identified as ~~PS1~~ **P127**. This press was installed in 1996.

7. One (1) web press (Model 88-1233-D1) which is identified as P**1**22. This press was installed in 1995.

8. One (1) web press (Model 92-1228) which is identified as P**1**23. This press was installed in 1996.

9. One (1) web press (Model 85-1638) which is identified as P**1**39. This press was installed in 1987.

~~15. One (1) web press (Model 2C108) which is identified as P2. This press was installed in 1978.~~

~~16. One (1) web press (Model 2C108) which is identified as P3. This press was installed in 1979.~~

~~17. One (1) web press which is identified as Pkluge. This press is only utilized for rewinding of printed roll stock. Therefore, it cannot be used in any capacity that would generate emissions.~~

10. One (1) mobile Scitex Imaging Unit (Model 6240) which is identified as Scitex Mobile Unit #1.

11. One (1) five (5) color flexographic printing press (Model Commander) which is identified as P**1**24. This press was installed in 2000.

12. One (1) seven (7) color, eighteen (18) inch Comco Press with a Hot Glue Unit, identified as **P1**13. This press was installed in 2001.

13. Two (2) five (5) color, eighteen (18) inch Comco Presses with a Hot Glue Unit each, identified as **P1**14 and **P1**15. These presses were installed in 2001.

14. One (1) four (4) color, sixteen inch Comco Press with a Scitex Imaging Unit, identified as #491. This press was installed in 2001

15. One (1) eight (8) color, sixteen inch Comco Press with High-Capacity Dryers, identified as P#109. This press was installed in 2001.

SECTION D.1 FACILITY OPERATION CONDITIONS

~~1. One (1) web press (Model MPDC108) which is identified as P4. This press was installed in 1981.~~
~~2. One (1) web press (Model MPDC108) which is identified as P5. This press was installed in 1981.~~
~~3. One (1) web press (Model 90-1232) which is identified as P19. This press was installed in 1991.~~
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14. One (1) four (4) color, sixteen inch Comco Press with a Scitex Imaging Unit, identified as #491. This press was installed in 2001.
15. One (1) eight (8) color, sixteen inch Comco Press with High-Capacity Dryers, identified as P#109. This press was installed in 2001.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Mr. Darren Woodward, at (812) 462-3433, extension 15.

Sincerely,

Original Signed by George M. Needham
George M. Needham
Director
Vigo County Air Pollution Control

Attachments
DKW
cc: Mindy Hahn - IDEM
Winter Bottum - IDEM

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
and
OFFICE OF AIR QUALITY
and
Vigo County Air Pollution Control

Standard Register Company
1251 North Fruitridge Avenue
Terre Haute, Indiana 47804

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the facilities listed in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 and 326 IAC 2-1-3.2, as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F167-7790-00060	
Issued by: George M. Needham, Director Vigo County Air Pollution Control	Issuance Date: March 17, 1998

First Administrative Amendment F167-11401 Issued on October 14, 1999 (Page(s) affected: 5, 25)
Second Administrative Amendment F167-12294 Issued on August 7, 2000 (Page(s) affected: 4, 5, 25)
Third Administrative Amendment F167-12655 Issued on September 13, 2000 (Page(s) affected: None)
Fourth Administrative Amendment F167-14571 Issued on July 19, 2001 (Page(s) affected: 5, 25)

Fifth Administrative Amendment F167-15077	Pages Affected: 4, 5 and 25
Issued by: Original Signed by George M. Needham George M. Needham, Director Vigo County Air Pollution Control	Issuance Date: December 26, 2001

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and Vigo County Air Pollution Control (VCAPC), and presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a flexographic printing operation.

Responsible Official:	Plant Manager
Source Address:	1251 North Fruitridge, Terre Haute, Indiana 47808
Mailing Address:	Same as Source Address
SIC Code:	2761
County Location:	Vigo
County Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Major Source, under Emission Offset Rules;

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

1. One (1) web press (Model 88-1232) which is identified as P121. This press was installed in 1994.

2. One (1) web press (Model 88-1242) which is identified as P120. This press was installed in 1990.

3. One (1) web press (Model 89-1241) which is identified as P118. This press was installed in 1990.

4. One (1) web press (Model 88-1234) which is identified as P17. This press was installed in 1989.

5. One (1) web press (Model 90-1255) which is identified as P140. This press was installed in 1993.

6. One (1) web press (Model 390-4598) which is identified as P127. This press was installed in 1996.

7. One (1) web press (Model 88-1233-D1) which is identified as P122. This press was installed in 1995.

8. One (1) web press (Model 92-1228) which is identified as P123. This press was installed in 1996.

9. One (1) web press (Model 85-1638) which is identified as P139. This press was installed in 1987.

10. One (1) mobile Scitex Imaging Unit (Model 6240) which is identified as Scitex Mobile Unit #1.

11. One (1) five (5) color flexographic printing press (Model Commander) which is identified as P124. This press was installed in 2000.

12. One (1) seven (7) color, eighteen (18) inch Comco Press with a Hot Glue Unit, identified as P113. This press was installed in 2001.

13. Two (2) five (5) color, eighteen (18) inch Comco Presses with a Hot Glue Unit each,

identified as P114 and P115. These presses were installed in 2001.

14. One (1) four (4) color, sixteen inch Comco Press with a Scitex Imaging Unit, identified as #491. This press was installed in 2001

15. One (1) eight (8) color, sixteen inch Comco Press with High-Capacity Dryers, identified as P#109. This press was installed in 2001.

A.3 Insignificant Activities [326 IAC 2-7-1(20)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(20):

(1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
(2) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
(3) Paved and unpaved roads and parking lots with public access.
(4) Any unit emitting greater than 1 pound per day but less than 5 pounds per day or 1 ton per year of a single HAP.
NOTE: The CYREL plate processing unit is used to produce all of the Flexographic plates used at the facility. Production from this unit is 2 plates in 2.5 hours. The process is a closed loop operation in which the solvent (CYREL Washout Solution) is only exposed during installation and removal of a plate from the processor unit. The solvent is replenished continuously at a rate of 6.8 pounds/hour during operation and the used solvent is recycled. The actual solvent losses during processing amount to 4% by weight. These emissions are fugitive. Fugitive VOC emissions are 0.27 pounds/hour. The solvent is 75 wt% Perchloroethylene. Waste solvent is manifested for offsite disposal.

A conversation was held with an IDEM, OAQ engineer who stated that Standard Register could receive credit for recycling and would have to count only the 4 wt% not recycled towards potential emissions.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and Vigo County Air Pollution Control (VCAPC) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permit Conditions Superseded [326 IAC 2]

This permit supersedes the operating conditions of all construction and operating permits issued to this stationary source under 326 IAC 2 prior to the effective date of this FESOP.

SECTION D.1 FACILITY OPERATION CONDITIONS

1. One (1) web press (Model 88-1232) which is identified as P121. This press was installed in 1994.
2. One (1) web press (Model 88-1242) which is identified as P120. This press was installed in 1990.
3. One (1) web press (Model 89-1241) which is identified as P118. This press was installed in 1990.
4. One (1) web press (Model 88-1234) which is identified as P117. This press was installed in 1989.
5. One (1) web press (Model 90-1255) which is identified as P140. This press was installed in 1993.
6. One (1) web press (Model 390-4598) which is identified as P127. This press was installed in 1996.
7. One (1) web press (Model 88-1233-D1) which is identified as P122. This press was installed in 1995.
8. One (1) web press (Model 92-1228) which is identified as P123. This press was installed in 1996.
9. One (1) web press (Model 85-1638) which is identified as P139. This press was installed in 1987.
10. One (1) mobile Scitex Imaging Unit (Model 6240) which is identified as Scitex Mobile Unit #1.
11. One (1) five (5) color flexographic printing press (Model Commander) which is identified as P124. This press was installed in 2000.
12. One (1) seven (7) color, eighteen (18) inch Comco Press with a Hot Glue Unit, identified as P113. This press was installed in 2001.
13. Two (2) five (5) color, eighteen (18) inch Comco Presses with a Hot Glue Unit each, identified as P114 and P115. These presses were installed in 2001.
14. One (1) four (4) color, sixteen inch Comco Press with a Scitex Imaging Unit, identified as #491. This press was installed in 2001.
15. One (1) eight (8) color, sixteen inch Comco Press with High-Capacity Dryers, identified as P#109. This press was installed in 2001.

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Volatile Organic Compounds (VOC)

That the VOC emissions from all the presses combined shall not exceed 99 tons per twelve (12) month consecutive period. Therefore, the requirements of 326 IAC 2-7, 326 IAC 8-5-5, and 326 IAC 8-6-1 do not apply.

D.1.2 VOC [326 IAC 8-1-6]

Any change or modification, except items 15 and 16, which may increase the potential emissions to 25 tons per year or more from the equipment listed above, would require prior approval from IDEM and VCAPC.

D.1.3 Hazardous Air Pollutants

That the hazardous air pollutant emissions from all the presses combined shall not exceed 9.0 tons per year for any single HAP and/or 24 tons per year for any combination of HAP's rolled monthly. Therefore, the requirements of 326 IAC 2-7 do not apply.

D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-8-5(1)]

Testing of this facility is not specifically required by this permit. However, this does not preclude testing requirements on this facility under 326 IAC 2-8-4 and 326 IAC 2-8-5.

D.1.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a)(7) using formulation data supplied by the coating manufacturer. IDEM, OAQ and VCAPC reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.